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18 TYISHA DANZY

19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**

21 **SAN FRANCISCO DIVISION**

22 TYISHA DANZY, individually and on behalf of
all others similarly situated,

Case No. 4:22-CV-01923-WHO

23 Plaintiffs,

**STIPULATED REQUEST FOR ORDER
CONTINUING HEARING DATE AND
CASE MANAGEMENT CONFERENCE;
ORDER**

24 vs.
25 MDG USA Inc., a Delaware corporation; and
DOES 1-50, inclusive,

26 Defendants.

27 Complaint Filed: February 23, 2022
28 Trial Date: TBD

Case No. 3:22-cv-01923-WHO

**STIPULATED REQUEST FOR ORDER CONTINUING
HEARING DATE AND CASE MANAGEMENT CONFERENCE**

1 Pursuant to Local Rules 6-1, 6-2, 7-7(b), and 7-12, plaintiff Tyisha Danzy and defendant MDG
2 USA Inc., by and through their undersigned counsel, agree and stipulate as follows:

3 **WHEREAS**, on March 25, 2022, MDG removed this case from California state court.

4 **WHEREAS**, on April 13, 2022, the Court entered a case management conference order (Dkt.
5 No. 22) scheduling the initial case management conference in this case for June 28, 2022, at 2:00 p.m.
6 before the Honorable William H. Orrick via Zoom Webinar.

7 **WHEREAS**, on April 22, 2022, Plaintiff filed a Motion to Remand.

8 **WHEREAS**, on May 6, 2022, MDG filed a Motion for Judgment on the Pleadings.

9 **WHEREAS**, the Court has scheduled a hearing on the pending motions for June 15, 2022, at
10 2:00 p.m.

11 **WHEREAS**, the parties have recently engaged in discussions regarding potential resolution of
12 this matter.

13 **WHEREAS**, the parties agree that a brief continuance of the case management conference and
14 the hearing on the pending motions would facilitate further discussion by the parties. The parties
15 further believe that it would save judicial resources to conduct the motion hearing and the case
16 management conference on the same date.

17 **WHEREAS**, the parties agree to stipulate to continuing the hearing on the pending motions
18 and the case management conference to July 20, 2022 at 2:00 p.m., or such later date and time at the
19 Court's convenience.

20 **WHEREAS**, the parties have not previously stipulated to or requested any extensions of time
21 with respect to the initial Case Management Conference or the hearing on Plaintiff's Motion to Remand
22 and MDG's Motion for Judgment on the Pleadings.

23 **IT IS HEREBY STIPULATED** that the initial Case Management Conference and the hearing
24 on plaintiff's motion to remand and MDG's motion for judgment on the pleadings be re-set to **July 20,**
25 **2022 at 2:00 p.m.**, or such later date and time at the Court's convenience.

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27 ///

28 ///

1 **K&L GATES LLP**
2

3 Dated: June 8, 2022

4 By: /s/ Jonathan Theonugraha
5 ANDREW C. GLASS
6 GREGORY N. BLASE
7 JEREMY M. McLAUGHLIN
8 JONATHAN THEONUGRAHA

9 Attorneys for Defendant
10 MDG USA INC.

11 Dated: June 8, 2022

12 **DOSTART HANNINK & COVENY LLP**
13

14 By: /s/ Zach P. Dostart
15 JAMES T. HANNINK
16 ZACH P. DOSTART

17 Attorneys for Plaintiff
18 TYISHA DANZY

19 **FILER'S SIGNATURE ATTESTATION PURSUANT TO CIVIL LOCAL RULE**

20 I, Jonathan Theonugraha, attest that concurrence in the filing of this document has been
21 obtained from the other signatories. All signatories listed, on whose behalf this filing is submitted,
22 concur in its content and authorize its filing.

23 **K&L GATES LLP**
24

25 Dated: June 8, 2022

26 By: /s/ Jonathan Theonugraha
27 JONATHAN THEONUGRAHA

ORDER

Pursuant to the foregoing stipulation, and for good cause showing, **IT IS HEREBY ORDERED** that:

1.) The hearing on plaintiff's motion to remand and MDG's motion for judgment on the pleadings currently scheduled for June 15, 2022 at 2:00 p.m. is vacated and re-set to **July 20, 2022 at 2:00 p.m.**

2.) The initial case management conference currently scheduled for June 28, 2022 at 2:00 p.m. is vacated and re-set to **July 20, 2022 at 2:00 p.m.**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 13, 2022

W. H. Orrick
HON. WILLIAM H. ORRICK
United States District Judge